

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20056

**RECEIVED**  
**FEB - 7 1997**

*Federal Communications Commission  
Office of Secretary*

In the Matter of )  
)  
Replacement of Part 90 by Part 88 )  
to Revise the Private Land Mobile Radio )  
Services and Modify the Policies )  
Governing Them )  
)  
and )  
)  
Examination of Exclusivity and )  
Frequency Assignment Policies )  
of the Private Land Mobile )  
Radio Services )

**DOCKET FILE COPY ORIGINAL**

PR Docket No. 92-235

**SUPPLEMENTAL COMMENTS OF MOTOROLA**

In accordance with the FCC's recent Public Notice<sup>1</sup>, Motorola hereby offers these supplemental comments to address the proposed technical blueprint submitted by the Industrial Telecommunications Association, Inc. (ITA) that develops proposed frequency use limitations for the post-refarming environment.<sup>2</sup>

For the past six years, Motorola has worked closely with the FCC and other industry representatives to develop a coherent plan for "refarming" the private land mobile spectrum

---

<sup>1</sup> Comments Sought on Industrial Telecommunications Association, Inc. Filing Concerning a Framework for Consolidation of the Private Land Mobile Radio Services, Public Notice, DA 97-206, released January 28, 1997.

<sup>2</sup> Proposed Technical Blueprint for Frequency Use Limitations in the Post-Refarming Environment, Letter to Michelle C. Farquhar by Mark E. Crosby, January 21, 1997 [hereinafter ITA Blueprint].

No. of Copies rec'd  
List ABCDE

024

under 512 MHz. The effort exerted by all industry segments, including the Commission, has been tremendous, and Motorola is gratified to see that the conclusion of this long-standing proceeding is near. Indeed, Motorola fears that any additional protracted delays could cause long term damage to an industry that has invested over 25 billion dollars in wireless equipment to support this nation's industrial and public safety infrastructures.<sup>3</sup>

To that end, Motorola applauds the continuing efforts of ITA to facilitate a speedy resolution to the outstanding decision on radio service consolidation. Motorola believes that ITA's Blueprint will prove invaluable regardless of how the FCC ultimately decides the consolidation issue. In particular, Motorola strongly supports the identification of channels for low power coordinated use and low power itinerant use.<sup>4</sup> As the Commission is well aware, the potential loss of all 2 watt "offset" channels at 450 MHz through the refarming process would have resulted in a lack of spectrum for a number of extremely useful low power wireless devices designed to operate over small localized areas. Recognizing this potential loss, the FCC indicated that it would permit coordinators to designate channels for low power use.<sup>5</sup>

Because of the continuing and growing need for low power channels, Motorola participated in a task force of the Land Mobile Communications Council (LMCC) and helped forge the recommendation that 50 channel pairs be specified for low power *coordinated* systems

---

<sup>3</sup> See, e.g., Report and Order and Further Notice of Proposed Rule Making, PR Docket No. 92-235, 10 FCC Rcd 10078.

<sup>4</sup> See ITA Blueprint at 6,7.

<sup>5</sup> Id. at 10110.


for users that would benefit from some level of protection at specified locations. Motorola also assisted in developing the recommendation that 25 channel pairs be specified for low power itinerant use to serve better small business users such as electricians and plumbers who characteristically require short range service at ever-changing job sites as a critical portion of their total communications requirements. Motorola is extremely gratified that these recommendations are included in ITA's blueprint. The FCC must act quickly and affirm these recommendations so that the freeze on UHF offset channels can be lifted and all frequency coordinators have a consistent channeling plan.

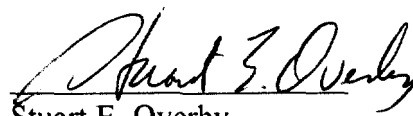
Motorola notes one minor correction to the ITA Blueprint. ITA proposes that the 25 low power itinerant channels be provided a maximum output power of 5 watts. This is in contrast to the recommendations of the LMCC task force that would limit power on these channels to 2 watts. While Motorola expects that this is simply a typographical error, we note that this modification to ITA's Blueprint will result in more efficient spectrum use without any apparent problems for this type of itinerant user. Motorola does concur, however, with the proposed 5 watt power limit for *coordinated* low power channels as the industrial environment where these channels will be most used requires additional power to provide the requisite coverage. Also, the ITA Blueprint proposes that the maximum antenna height for the low power *coordinated* channels be 100 feet above ground. Although this is consistent with the recommendation of the LMCC task force, Motorola requests that the FCC and user representatives consider whether an alternative maximum antenna height of 50 feet would be more appropriate to enhance spectrum efficiency and to meet operational requirements.

In conclusion, Motorola applauds the efforts of the ITA and implores the FCC to move quickly to resolve the few remaining issues in this long and difficult proceeding. The benefits of refarming can only be achieved once the regulatory framework is settled and completed.

Respectfully Submitted,

Motorola, Inc.


  
Richard C. Barth  
Director of Telecommunications  
Strategy and Regulation  
Motorola  
1350 Eye Street, N.W.  
Washington, D.C. 20005  
(202) 371-6900

  
Stuart E. Overby  
Assistant Director  
Spectrum Planning  
Motorola  
1350 Eye Street, N.W.  
Washington, D.C. 20005  
(202) 371-6900

February 7, 1997

**CERTIFICATE OF SERVICE**

I, Tanya R. Mason, of Motorola Inc. do hereby certify that on this 7th day of February, 1997 a copy of the foregoing "Comments" was sent to each of the following by hand:



Tanya R. Mason

William F. Caton, Acting Secretary  
Office of Managing Director  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Ira Keltz  
Private Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 8010  
2025 M Street, N.W.  
Washington, DC

David Horowitz  
Chief, Private Wireless Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
Room 8010  
2025 M Street, N.W.  
Washington, DC

Mark Crosby  
ITA  
1110 North Glebe Road  
Suite 500  
Arlington, VA 22201

International Transcription Services, Inc. (ITS)  
2100 M Street, N.W.  
Suite 140  
Washington, DC 20037